IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF MICHIGAN

TIMOTHY BOZUNG, individually and on behalf of all others similarly situated,

Case No. 22-cv-00304-HYJ-RSK

Plaintiff,

Honorable Hala Y. Jarbou

Magistrate Judge Ray S. Kent

v.

CHRISTIANBOOK, LLC f/k/a CHRISTIAN BOOK DISTRIBUTORS CATALOG, LLC,

Defendant.

PLAINTIFF'S MOTION TO COMPEL

Plaintiff Timothy Bozung ("Plaintiff"), individually and on behalf of all others similarly situated, moves to compel Christianbook, LLC f/k/a Christian Book Distributors Catalog, LLC ("Defendant" or "Christianbook") to produce all responsive, non-privileged documents in response to Plaintiff's Requests for Production and to provide substantive responses to Plaintiff's First Set of Interrogatories. Plaintiff states that, prior to bringing this motion, he—by and through his counsel—engaged in a lengthy meet-and-confer process that began with a phone call on November 30, 2022 and included numerous subsequent written communications. The meet-and-confer process was unsuccessful, thus necessitating the need for Court intervention.

Plaintiff, for his Motion, relies upon the arguments and authorities set forth in the Brief in Support of this Motion.

Dated: January 6, 2023 Respectfully Submitted,

/s/ E. Powell Miller
E. Powell Miller (P39487)
Sharon S. Almonrode (P33938)

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Counsel for Plaintiff and the Putative Class

CERTIFICATE OF SERVICE

I hereby certify that on January 6, 2023, I electronically filed the foregoing documents using the Court's electronic filing system, which will notify all counsel of record authorized to receive such filings.

/s/ E. Powell Miller

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/s/ E. Powell Miller
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